

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

ROBERT WAYNE,

Plaintiff,

v.

THE WASHINGTON UNIVERSITY,
d/b/a WASHINGTON UNIVERSITY,

Defendant.

Case No. 4:24-cv-01723-MTS

**MOTION OF DEFENDANT WASHINGTON UNIVERSITY TO DISMISS
COUNTS II, III, IV, V, VI, VII, IX, X, XI and XII OF THE COMPLAINT**

Defendant Washington University hereby moves pursuant to Fed. R. Civ. P. 12(b)(6) to dismiss Counts II, III, IV, V, VI, VII, IX, X, XI and XII of the Complaint [Doc. No. 1] for failure to state claims upon which relief may be granted. Plaintiff Robert Wayne, a former employee of the Washington University Police Department, filed a 12-count Complaint asserting claims of age discrimination, sex discrimination, hostile work environment and retaliation. Washington University moves to dismiss all of the counts, other than the age discrimination claims in Counts I and VIII, for failure to state a claim under the applicable federal and state statutes.

In support of its Motion, Washington University files herewith and incorporates herein by reference its Memorandum in Support of Motion to Dismiss.

WHEREFORE, Defendant Washington University respectfully requests that its Motion to Dismiss be granted and that the subject counts in Plaintiff's Complaint be dismissed with prejudice.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 10th day of March, 2025, the foregoing ***Motion to Dismiss*** was filed electronically with the Clerk of Court to be served by operation of the CM/ECF system upon all counsel of record.

/s/ Lisa A. Pake